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Attorneys for Richard Kwok,
Defendant

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

DYLAN STEWART, JR.,

Case No. 20-cv-1408-SJF

Plaintiff,

—against—

RICHARD KWOK, Individually, THOMAS
LOMBARDI, Individually, MICHAEL
MEINARDUS, Individually, JOSEPH COBIS,
Individually, JAY HAMPTON, Individually,
JOHN HENRY, Individually, MICHAEL
POETTA, Individually, ANTHONY BRETZ,
Individually, and JOHN and JANE DOE
1 through 10, Individually, (the names John
and Jane Doe being fictitious, as the true
names are presently unknown),

DECLARATION OF
CAROLYN SHIELDS

Defendants.

DECLARATION OF CAROLYN SHIELDS
(28 U.S.C. § 1746)

I, Carolyn Shields, declare:

1. I am Defendant's attorney. I have personal knowledge of the facts set forth herein and if called as a witness and could and would competently testify thereto.

2. Attached as Exhibit A is a true and correct copy of the affidavit of purported service of the summons and complaint on the Defendant, filed as document #20 in the ECF docket.

3. I forwarded the affidavit of purported service of the summons and complaint and plaintiff's notice of motion and motion for default judgment to the Defendant, the latter on September 17, 2020.

4. The delay in Defendant's taking a position in this case is attributable to the Defendant's intention to repeat his demand for a defense and indemnity from Suffolk County and if Suffolk County does not agree to defend and indemnify him, to commence a proceeding to that end.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 17, 2020.

s/ Carolyn Shields
Carolyn Shields